REMARKS/ARGUMENTS

Prior to this amendment, claims 1, 4-12, 15-18, 21-30, and 33-35 were pending. In this amendment, no claims are amended or added. Thus, after entry of this amendment, claims 1, 4-12, 15-18, 21-30, and 33-35 are pending.

Claims 1, 4-6, 11, 15, 18, 21-30, and 33 are rejected under 35 U.S.C § 103(a) as being unpatentable over US Patent No. 7,165,090 to Lunenfeld ("Lunenfeld") and US Patent No. 6,714,539 to Sbisa ("Sbisa").

Claims 7-10 and 16-17 are rejected under 35 U.S.C § 103(a) as being unpatentable over Lunenfeld and Sbisa in view of US Patent Publication No. 2003/0138091 to Meet et al. ("Meek") and further in view of US Patent Publication No. 2002/0040414 to Uehara ("Uehara").

Claims 34 and 35 are rejected under 35 U.S.C § 103(a) as being unpatentable over Lunenfeld and Sbisa in view of US Patent Publication No. 2002/0010798 to Ben-Shaul et al. ("Ben-Shaul").

Reconsideration of the rejection is requested based upon the comments below.

Claim Rejections Under 35 U.S.C § 103

To support a *prima facie* case of obviousness, the Examiner must demonstrate that each feature recited in the claims is found in the cited art, or provide explicit reasoning to support the finding that the features would be obvious to one of skill in the art at the time the invention was made. *See* M.P.E.P. §§ 2141, 2142. The Office Action asserts that each and every feature recited in the claims is disclosed by the cited art. As described in further detail below, applicants respectfully disagree.

Claim 1 recites in part:

> creating <u>a first request message including the plurality of queries</u> and a first sequence number associated with one or more of the queries;

In an illustrative embodiment of the present invention, the system receives multiple queries from multiple users. The network computer can accumulate multiple queries to be included in a single request message. Each such group of accumulated queries is assigned a

sequence number. A request message is generated which includes these queries and the sequence number associated with the queries. The Office Action asserts that the "creating..." feature of claim 1 is disclosed by Lunenfeld at Column 3, lines 2-5. Applicant respectfully traverses.

Lunenfeld is directed at a method for performing searches over a network that includes multiple queries initiated by multiple users. The cited section of Lunenfeld describes the capability of a client-server system as it relates to handling of queries. Lunenfeld states that the client server system "is capable of retrieving substantially multiple simultaneous services and/or information..." (Lunenfeld at Col 3, lines 4-5). While it may be true that the system in Lunenfeld handles multiple requests simultaneously, this is not the same as a single request message that includes multiple queries as recited in claim 1. The system in Lunenfeld merely responds to multiple queries from multiple users, and may do so simultaneously. Applicant submits that responding to multiple requests simultaneously is not analogous to creating a request message that includes a plurality of queries and a sequence number associated with the queries.

The Office action further asserts that the "a first sequence number..." feature is disclosed by Lunenfeld at Column 6, lines 39-55. Applicant respectfully traverses.

As best understood, the cited sections of Lunenfeld disclose the capabilities of the client-server system. Specifically, Lunenfeld discloses that an information request can be formatted into a current request group. There is no mention of a sequence number being created and associated with a plurality of requests. Applicant submits that Lunenfeld does not teach or suggest creating a sequence number that is associated with the plurality of queries. In fact, there is no concept in Lunenfeld of creating a sequence number and associating that sequence number with a plurality of replies. This is not surprising, because Lunenfeld discloses a keyword phrase that is included in each request/search query to track the query and a response to the query. Hence, Lunenfeld does not need other means of tracking the requests and responses to the requests, and does not disclose creating a sequence number that is associated with a plurality of queries shown.

Further, claim 1 recites:

Appl. No. 10/674,820
Amdt. dated May 13, 2009
Reply to Office Action of January 22, 2009

PATENT

> receiving a response message from the search engine, the response message including a <u>plurality of replies</u> and the first sequence number, wherein the first sequence number is associated with one or more of the replies

Applicants submit that Lunenfeld does not teach or suggest the above-mentioned feature. As discussed above, there is no concept in Lunenfeld of creating a sequence number and associating that sequence number to a plurality of requests. Consequently it follows that Lunenfeld also cannot teach a plurality of replies associated with that same sequence number. The cited section of Lunenfeld does not mention any sequence number, as discussed above. The replies received by the system in Lunenfeld are merely processed and forwarded to the respective users. Applicant submits that the response message in Lunenfeld does not include a plurality of replies and a sequence number associated with the plurality of replies, as recited in claim 1.

> In addition, claim 1 further recites:
>
> creating a plurality of reply messages from the plurality of replies; and
> sending the plurality of reply messages to the plurality of users over the network.

As recited in the "creating…" and "sending…" features of claim 1 above, a plurality of reply messages are created from the plurality of replies received, e.g., from the search engine. The plurality of replies may be included in a response message, e.g., a response superpacket (See FIG. 2, element # 240). As recited in claim 1, the system receives a response message from the search engine. This response message includes multiple replies that are grouped together. In one embodiment, the group of replies corresponds to a group of requests and is identified by the same sequence number that is associated with the group of requests. The system extracts the multiple replies included in the response message, creates a plurality of messages, and sends them to their respective destinations.

The Office Action acknowledges that Lunenfeld does not teach or suggest the above-mentioned elements but asserts that Sbisa discloses these features in at least Column 2, lines 25-30. Applicant respectfully traverses and submits that Sbisa fails to cure the deficiency in Lunenfeld.

Sbisa is directed at a telecommunications service control point that includes "multiple interfaces to receive multiple query messages from requesting devices using multiple different protocols." (Sbisa Abstract). The cited section of Sbisa discloses that the control point receives multiple queries that use multiple protocols and responds to those queries using their respective protocols. In Sbisa, "query messages are sent to the SCP from requesting device. The SCP processes the query message using call processing applications... After processing the call, the SCP returns a response message to the requesting device." (Sbisa at Col 3, lines 18-25). Applicant submits that there is no concept of creating a reply message from the plurality of replies in Sbisa. Sbisa merely processes the multiple requests and forwards the multiple replies to the appropriate requestors; there is no suggestion that Sbisa creates new reply messages based on the received replies.

Thus, Applicant submits that claim 1 is patentable over Lunenfeld and Sbisa, taken singly or even in combination, for at least the reasons stated above. Claims 4-10 and 28-35 which depend on claim 1, are also in condition for allowance for at least the reasons stated above and for the additional elements that they recite.

Claims 11 and 18 recite features similar to those discussed above with respect to claim 1 and, therefore, are allowable over Lunenfeld and Sbisa for at least a similar rationale as discussed for claim 1 above. Claims 12, 15-17, and 21-27, which depend on claims 11 and 18, respectively, are also in condition for allowance for at least the reasons stated above and for the additional elements that they recite.

Appl. No. 10/674,820
Amdt. dated May 13, 2009
Reply to Office Action of January 22, 2009

PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 202-481-9900.

Respectfully submitted,

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